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6 *Fire Claimant*

7
8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 In re:

12 PG&E CORPORATION,

13 -and-

14 PACIFIC GAS AND ELECTRIC
15 COMPANY,

16 Debtors.

- 17 ☐ Affects PG&E Corporation
18 ☐ Affects Pacific Gas and Electric
19 Company
20 ☒ Affects both Debtors
21 * All papers shall be filed in the lead case,
22 No. 19-30088 (DM)

Case No. 19-30088 (DM)
Chapter 11
(Jointly Administered)

**DECLARATION OF HELEN SEDWICK IN
SUPPORT OF MOTION FOR APPOINTMENT
OF AN EXAMINER OF VOTING
PROCEDURAL IRREGULARITIES
PURSUANT TO SECTION 1104(c) OF THE
BANKRUPTCY CODE AND RULE 2007.1**

Date: June 4, 2020
Time: 9:30 a.m. (Pacific Time)
Place: Courtroom 17
United States Bankruptcy Court
450 Golden Gate Avenue, 16th Floor
San Francisco, CA 94102
Judge: Honorable Dennis Montali

Objection Deadline: June 2, 2020

23 I hereby declare under penalty of perjury that the following is true and correct to the best of
24 my knowledge, information, and belief:

- 25 1. I am a fire claimant in the above-referenced case. I lost my home, office, and incurred
26 other losses at 2896 Bardy Road, Santa Rosa, CA during the Nuns Fire. My Proof of
27 Claim number is 53235.
28 2. I am one of the Administrators of a Facebook Group called Wildfire Settlement
Discussion Group, and I am a participant in other Facebook Groups for victims of the
2017 North Bay Fires and 2018 Camp Fire.

- 1 3. On various dates starting on May 3, 2020 and continuing through May 22, 2020, I
2 reviewed Facebook posts and comments in which people reported that they received
3 their ballot materials just prior to the May 15, 2020 deadline, after the deadline, or not
4 at all. I also received emails from fire claimants with similar information.
- 5 4. I collected close to 200 names. I eliminated from that preliminary list those for whom
6 I could not easily find claim numbers for reasons such as people may not have used
7 their full name on Facebook. I also eliminated those people whom I suspected may
8 have received their ballot materials via text or email from Watts Guerra, Skikos other
9 other firms, but did not realize it.
- 10 5. Attached as **Exhibit A** is the list of those who met the criteria set forth above.
- 11 6. According to Exhibit B-1 attached to DECLARATION OF CHRISTINA PULLO OF
12 PRIME CLERK LLC REGARDING SOLICITATION OF VOTES AND
13 TABULATION OF BALLOTS CAST WITH RESPECT TO THE DEBTORS' AND
14 SHAREHOLDER PROPONENTS' JOINT CHAPTER 11 PLAN OF
15 REORGANIZATION [Docket # 6507], approximately 980 Class 5A-III and 5B-III
16 Fire Victim Claimants submitted ballots to Prime Clerk after the voting deadline. This
17 indicates that the late receipt of ballots may have been a widespread problem.

18 I declare under penalty of perjury pursuant to the Laws of the State of California that, to the
19 best of my knowledge and after reasonable inquiry, the foregoing is true and correct and that this
20 declaration was executed at Glen Ellen, CA on May 29, 2020.

21 Respectfully Submitted,

22 Dated: May 29, 2020

23 /s/ Helen Sedwick

24 Fire Claimant

25 Pursuant to Local Rule 5-1(i)(3), I attest that concurrence in filing this document has been
26 obtained from the signatory, Helen Sedwick.

27 /s/ Bonnie E. Kane

28 Bonnie E. Kane

EXHIBIT A
FIRE CLAIMANTS REPORTING
LATE OR MISSING BALLOT MATERIALS

Names	Date Received	Claim Numbers	Representation
1. Albritton, David and Susan	5-15	63868	No attorney
2. Aldred-Schreiber, 3. Kristen, 4. Addyson (m), 5. Everlie (m), 6. Kash (m)	5-15	39245, 74494 39244, 74221 39245, 74205 39242, 74200	
7. Allemandi, Jessica	5-15	82790	No attorney
8. Bannister, Terrie 9. Stuart (m), 10. Haley (m), 11. A.S (m)	1 on 5-12 4 never	65465	
12. Barton, Diane	late	94360	No attorney
13. Bean, Robert Louis	5-14	96470	No attorney
14. Bogosian, Tara	never	710060, 66731 43711, 78831	
15. Bowmer, Emetta	5-13	40843 72714	
16. Buerer Mann, Diane	5-15	42698	
17. Carter, Kari J.	5-15	35468	No attorney
18. Chapple, Deborah	never	38792, 74774	
19. Clark, Elizabeth H.	5-14	83926	No attorney
20. Coffey-McKay, Kim	5-13	83577	No attorney
21. Cohen, Victoria	5-13	92248	No attorney
22. Dimbat, Jared	never	70615	
23. Donnelson, Tami	never	40907	
24. Driscoll, Patricia	5-13	57456	No attorney
25. Duterte, Isaac	5-16	86191	No attorney
26. Eani-Dimbat, Kelly, Craig Dimbat, CE (m)	5-15	70491	No attorney
27. Florence, Lori	5-15	38695, 72090	
28. Frost, David and Lori Revocable Trust	5-15	10109	No attorney
29. Hanosh, Michelle	Never	10048	
30. Hartman, Christine	late	32242	
31. Henson, James	5-14	39323, 69954	
32. Howell, Donny	Never	94215	
33. Ingalls, Karen Lynn	5-15	85774	No attorney
34. Jolliff, Lani Christina	5-13	16550	No attorney

1	35. Johnston, Christopher	5-16	29627, 73875	
2	36. Kaksonen, Suzanne	Never	69572	
3	37. Ligan, Linda	late	63136	No attorney
4	38. Longoria, Lisa Marie	5-18	22776, 95338	
5	39. Marburger, Scot	5-12	8999	No attorney
6	40. Maynard, Cheryl	5-15	97006	No attorney
7	41. Mazzoni, Nancy	5-12	9537	No attorney
8	42. McFall, Anika	Late	42395, 71337	
9	43. McFall, Lisa	late	43250, 69000	
10	44. McFarland, Shawn, 45. Amy, 46. Alaina (m), 47. Ryan (m), 48. ASM Transcription	Received 3 out of 5 around 5-13	65560 59531 64795 67006	
11	49. Mckean, Kevin	5-13	77154, 86653	
12	50. Mckean, Terry	5-13	33839, 35892, 71798	
13	51. Messina, Kimberly	Never	83099	No attorney
14	52. Morelli, John	Never	5891	No attorney
15	53. Morreale, Jeri		38959, 75620	
16	54. Mulhair, Kyle	5-14	42512, 70408	
17	55. Catherine		43173, 76654	
18	56. Naslund, Barbara	5-15	8997	No attorney
19	57. Neely, Denise	5-15	71354	No attorney
20	58. Ng, Paul (3 claims) 59. son 60. son	Received only 2	43887, 59770, 60324, 77635	
21	61. North, Sharon (3 claims) 62. child 63. child	5-14 and 5- 15	29751	
22	64. Paradise Pines Property Owners Association	5-15	83074	No attorney
23	65. Peavler, Pam Michelle	Never	94215	No attorney
24	66. Peters, Michael	5-15	64194	
25	67. Pitre, Goldie B.	5-13	56921	No attorney
26	68. Polen, Samantha	5-19	44297, 77148, 81014, 89072	
27	69. Porter, Anita	5-13	96303	No attorney
28	70. Putnam, Jennifer Geocaris	5-15	92330	No attorney
	71. Raisch, Lauren Stella	Never	78011	No attorney
	72. Reinert, Cody 73. Addison 74. Nathanial	5-19	44093, 44142, 44269, 76281, 76348, 77133,	

		80172,81642, 88980, 89066, 89069, 89073, 89084	
75. Riley, Crystal Denise	5-15	71293 43575 76234 68362	
76. Rizzo, Joann	5-16	62993	No attorney
77. Rohrer-McCoy, Patricia	late	17011	No attorney
78. Son (m)			
79. Saldana, Angela	Never	94456	No attorney
80. Sanguinet, Andrea	5-12	42354, 78000	
81. Scheideman, Pam	5-14	43488, 81692, 85327	
82. Secord, Karen	Late	58798	No attorney
83. Shade, Larry	5-14	31275	
84. Shimmel, April	5-12	34171, 38255	
85. Stelton, Tammy	5-15	39597	
86. Stout, Kierstyn	5-15	95352	No attorney
87. Swopes, Tim	5-13	43799, 77524, 79946	
88. Kinsley (m)		43159, 77554	
89. Eli (m)		42741, 77554	
90. Ulmen, Patti and Charles	Never	32644	
91. Veniegas, Ernie		57083	No attorney
92. Wagenhoffer, Michael	Never	40228	
93. Wallace, Mary Kim	5-16	68955	No attorney
94. White, Marian	kate	94408	No attorney
95. Whited, Julie	5-15	43086, 77164	
96. Williamson, Cynthia		34235, 38319, 72295	
97. Winters, Angela	5-13	64010	
98. Cox, Christi	5-15	42543, 76980	
99. Gann, Victoria	Late	84840	
100. Garibay, Alyssa	Never	39121	
101. Garibay, Dawn	Never	72355	
102. Garibay, Jason	Never	39120, 39119	
103. McCown, Daniel	No ballot	15289	
104. McCown, Denise	No ballot	15290	
105. Neves, Deborah	Never	84225	No attorney
106. Ross, Jamey	5-12	83752	No attorney
107. Valva, Joseph	Never	75506, 85260	
108. Marilyn			
109. Dylan Shaw			
110. Scott Shaw			

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111. Amissa Thorp 112. Child 1 113. Child 2			
114. Wohlau, Dirk 115. Trtust	Never	96289 96234	